



UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

XXX SIQINAODE,

Defendant.

CR No. **2:24-CR-00386-SB**

I N F O R M A T I O N

[18 U.S.C. § 1956(h): Conspiracy
to Commit Money Laundering]

The United States Attorney charges:

[18 U.S.C. § 1956(h)]

A. INTRODUCTORY ALLEGATIONS

At times relevant to this Information:

1. Defendant XXX SIQINAODE resided in Ontario, California, and was the sole signatory on the following bank accounts (collectively, "defendant SIQINAODE's Accounts"):

a. A bank account held with Bank of America in the name of Sunton International Trade LLC, with account number ending in 2826 ("Account 1");

b. A bank account held with JP Morgan Chase Bank, N.A. in the name of Carson International LLC, with account number ending in 0057 ("Account 2"); and

1 c. A bank account held with PNC Bank in the name of
2 Hotyin Real Estate LLC, with account number ending in 3906
3 ("Account 3").

4 2. Sunton International Trade LLC, Carson International LLC,
5 and Hotyin Real Estate LLC were companies that defendant SIQINAODE
6 created for the purpose of opening defendant SIQINAODE's Accounts in
7 their names and did not operate as legitimate businesses.

8 3. There was a scheme intending to defraud elderly victims
9 (the "fraud scheme"). Co-schemers of the fraud scheme communicated
10 with the victims, using interstate wire communications such as phone
11 or email, and pretended to be federal government representatives from
12 agencies such as the Federal Trade Commission, Social Security
13 Administration, and the Federal Reserve Bank, or representatives from
14 large publicly-traded companies. Co-schemers tricked these victims
15 into putting their money in accounts that the co-schemers controlled.
16 J.W.L., M.I.L., C.O.H., B.K.A., J.O.A., C.P.M., M.H.L., and G.A. were
17 each a victim of this fraudulent scheme. At least \$846,700 of these
18 victims' fraudulently obtained money was sent to defendant
19 SIQINAODE's Accounts.

20 B. THE OBJECT OF THE CONSPIRACY

21 4. Beginning no later than on or about August 3, 2023, and
22 continuing to on or about February 6, 2024, in Los Angeles and San
23 Bernardino Counties, within the Central District of California, and
24 elsewhere, defendant SIQINAODE conspired with Co-Conspirator 1, and
25 others known and unknown to the United States Attorney, to knowingly
26 conduct and attempt to conduct financial transactions knowing that
27 the property involved in the financial transactions represented the
28 proceeds of some form of unlawful activity, namely, wire fraud, in

1 violation of Title 18, United States Code, Section 1343, knowing that
2 the transactions were designed in whole and in part to conceal and
3 disguise the nature, location, source, ownership, and control of the
4 proceeds of specified unlawful activity, in violation of Title 18,
5 United States Code, Section 1956(a)(1)(B)(i).

6 C. THE MANNER AND MEANS OF THE CONSPIRACY

7 5. The object of the conspiracy was to be carried out, and was
8 carried out, in substance, as follows:

9 a. Defendant SIQINAODE would create companies to launder
10 proceeds from the fraud scheme, which would not operate as legitimate
11 business, and open bank accounts in their names to receive proceeds
12 of the fraud scheme.

13 b. Co-Conspirators, including Co-Conspirator 1, would
14 cause proceeds of the fraud scheme to be deposited into defendant
15 SIQINAODE's Accounts.

16 c. Once the proceeds of the fraud scheme were deposited
17 into defendant SIQINAODE's Accounts, Co-Conspirator 1 would tell
18 defendant SIQINAODE what to do with the money, which included
19 providing information pertaining to accounts held at financial
20 institutions based in China (the "Chinese Accounts").

21 d. At the direction of Co-Conspirator 1, defendant
22 SIQINAODE would transfer proceeds of the fraud scheme from defendant
23 SIQINAODE's Accounts into the Chinese Accounts, knowing that such
24 funds were proceeds of fraud.

25 e. Defendant SIQINAODE would withdraw proceeds of the
26 fraud scheme from defendant SIQINAODE's Accounts, in cash, to use for
27 his own benefit.

6. In total, defendant SIQINAODE and his co-conspirators laundered at least approximately \$846,700 in fraud proceeds through defendant SIQINAODE's Accounts.

D. OVERT ACTS

7. On or about the following dates, in furtherance of the conspiracy and to accomplish its object, defendant SIQINAODE, together with Co-Conspirator 1 and others known and unknown to the United States Attorney, committed various overt acts within the Central District of California, and elsewhere, including, but not limited to, the following:

Overt Act No. 1: On September 19, 2023, defendant SIQINAODE transferred \$45,600, which was money fraudulently obtained from fraud scheme victim M.H.L., from Account 1 to one of the Chinese Accounts.

Overt Act No. 2: On September 19, 2023, defendant SIQINAODE withdrew \$2,200, which was money fraudulently obtained from fraud scheme victim M.H.L., in cash from Account 1.

Overt Act No. 3: On September 25, 2023, defendant SIQINAODE transferred \$103,455, which was money fraudulently obtained from fraud scheme victims J.W.L. and M.I.L., from Account 1 to one of the Chinese Accounts.

Overt Act No. 4: On September 25, 2023, defendant SIQINAODE withdrew \$5,500, which was money fraudulently obtained from fraud scheme victims J.W.L. and M.I.L., in cash from Account 1.

Overt Act No. 5: On October 2, 2023, defendant SIQINAODE transferred \$79,890, which was money fraudulently obtained from fraud scheme victim C.O.H., from Account 1 to one of the Chinese Accounts.

Overt Act No. 6: On October 11, 2023, defendant SIQINAODE transferred \$51,250, which was money fraudulently obtained from fraud

1 scheme victims C.P.M. and B.K.A., from Account 1 to one of the
2 Chinese Accounts.

3 E. MARTIN ESTRADA
4 United States Attorney

5 MACK E. JENKINS
6 Assistant United States Attorney
7 Chief, Criminal Division



8 SCOTT M. GARRINGER
9 Assistant United States Attorney
10 Deputy Chief, Criminal Division

11 IAN V. YANNIELLO
12 Assistant United States Attorney
13 Chief, General Crimes Section

14 BENEDETTO L. BALDING
15 Assistant United States Attorney
16 Deputy Chief, General Crimes Section

17 LISA J. LINDHORST
18 Assistant United States Attorney
19 General Crimes Section
20
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